

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA  
ALEXANDRIA DIVISION**

THE STATE OF LOUISIANA,  
By and through its Attorney General, JEFF  
LANDRY, et al.,

PLAINTIFFS,

v.

JOSEPH R. BIDEN, JR. in his official capacity  
as President of the United States, et al.,

DEFENDANTS.

CIVIL ACTION NO. 1:21-cv-3867-DCJ-JPM

**MOTION FOR PRELIMINARY INJUNCTION**

Plaintiff States respectfully move this Court for an order under Rule 65 of the Federal Rules of Civil Procedure granting a preliminary injunction, with expedited consideration, in their favor against the named Defendants in their official capacities. As explained in the Complaint and attached Memorandum supporting this motion, Defendants have acted without statutory authority, violated the Administrative Procedure Act, violated the Procurement Act, violated the Procurement Policy Act, and violated the Constitution by promulgating and implementing the Contractor Vaccine Mandate.

This Motion is made on the grounds specified in this Motion, the Complaint, the accompanying Memorandum of Law, the exhibits attached to the Complaint and to this Motion, all matters of which this Court may take judicial notice, and on such other and further oral or documentary evidence as may be presented to the Court at or before the hearing on this Motion. Plaintiff States are substantially likely to prevail on the merits of their claims and preliminary injunctive relief is necessary to avoid imminent and substantial injuries to their sovereign, quasi-sovereign, and

proprietary interests. And the public interest and balance of harms favor an order compelling Defendants to follow the law.

For these reasons and those explained in the attached Motion, Plaintiff States respectfully request a preliminary injunction restraining Defendants from implementing the Contractor Vaccine Mandate.

Respectfully submitted,

Dated: November 12, 2021

/s/ Elizabeth B. Murrill

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*\*Pro Hac Vice admission application forthcoming*